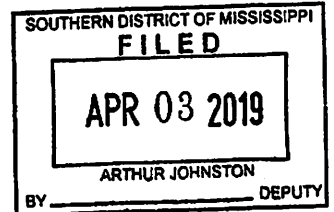


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:19cr00061-RHW

DANNIE CURLEE, JR.

18 U.S.C. § 2252(a)(4)(B) and (b)(2)
18 U.S.C. § 2252(a)(1) and (b)(1)
18 U.S.C. § 2251(a) and (e)

The Grand Jury charges:

COUNT 1

From on or about May 16, 2009, continuing to on or about July 12, 2018, in Pearl River County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **DANNIE CURLEE, JR.**, did knowingly access with intent to view, one or more matters that contained any visual depiction, that had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials that had been mailed, shipped, and transported, by any means, including by a Toshiba Satellite M305 laptop computer, serial number X8135507W containing a Hitachi 250 GB hard drive, serial number: 080825BB6F00WDFB52LF, the production of which involved the use of one or more minors, to include a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 2

From on or about September 21, 2010, continuing through on or about July 12, 2018, in Pearl River County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **DANNIE CURLEE, JR.**, did knowingly access with intent to view, one or more matters that contained any visual depiction, that had been mailed, shipped, and transported using

any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials that had been mailed, shipped, and transported, by any means, including by a Dell Inspiron laptop computer, Service Tag: 5G2QDL1, containing a Hitachi 500 GB hard drive, serial number 100302PBN408B7GE25WL, the production of which involved the use of one or more minors, to include a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 3

On or about February 26, 2016, continuing through on or about May 17, 2017, in Pearl River County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **DANNIE CURLEE, JR.**, knowingly transported, using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means, any visual depiction, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

COUNT 4

That on or about February 22, 2017, in Pearl River County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **DANNIE CURLEE, JR.**, employed, used, persuaded, induced, enticed, and coerced Minor female A, who was then approximately 1 year old, to engage in sexually explicit conduct, for the purpose of producing one or more visual depictions of such conduct, and such visual depictions were produced using materials that had been mailed, shipped, and transported, in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offense.

One (1) Toshiba Satellite M305 laptop computer, serial number X8135507W containing a Hitachi 250 GB hard drive, serial number: 080825BB6F00WDFB52LF; and

One (1) Dell Inspiron laptop computer, Service Tag: 5G2QDL1, containing a Hitachi 500 GB hard drive, serial number 100302PBN408B7GE25WL.

Further, if any property described above, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

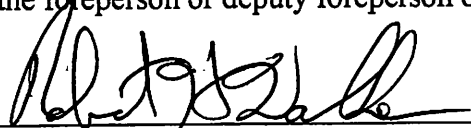
All pursuant to Title 18, United States Code, Sections 2253(a)(2) and (3).

A TRUE BILL:


D. MICHAEL HURST, JR.
United States Attorney

s/signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 3rd day of April, 2019.


UNITED STATES MAGISTRATE JUDGE